

EXHIBIT E

MAYOR

Oscar Crawley

CITY MANAGER

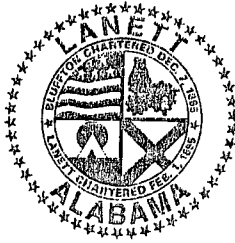
Joel Holley

CITY CLERK

Deborah Daniel

CITY TREASURER

Jenell Lee

**COUNCIL MEMBERS**

Tony Malone

Jamie Heard

Kyle McCoy

John Duskin

Mike Yarbrough

**PLAINTIFF'S EXHIBIT
E**

State of Alabama
Chambers County
City of Lanett

This written statement is hereby made and given at the request of Officer Teddy Morris of the Lanett Police Department.

My name is Joel G. Holley. I have been employed since May 16, 2005, as City Manager for the City of Lanett, after having served as a District Judge for Chambers County for the last twenty-five (25) years.

Late Sunday afternoon, November 6, 2005, I received a call on my City cell phone. The caller identified himself as Officer (Lt.) Dean Vanmeter, whom I've known for many years. Dean said that someone, who told him something about a personnel matter or that he was being investigated, had called him. I sort of gathered my thoughts and responded to him that yes, there was an I.A. investigation concerning personnel files. He said or responded that they (files) were "here on my table". I then asked where he got them. He responded, that a fireman told him they were being thrown away and he got some for his friends. I asked why and he said he figured they would want their personnel file for historical reasons or just to have. I told him he needed to turn them in the next day (Monday) to the Police Chief. He responded that he would bring them to me. Again, I suggested he turn them over to Chief Docimo. I remember and noted it to Chief Docimo whom I called as soon as the conversation with Dean ended. Dean's speech was very slow/deliberate. It was different from his normal speech. I noted to Chief Docimo that he sounded like he had been drinking.

On Monday, November 7, 2005, after Dean called me that Sunday afternoon, I saw him upon my arrival at the City Hall. He was off duty that day and as I exited my vehicle, he came up with files in his hand. He followed me in the side door to my office. He sat down in front of my desk after handing me the stack of personnel files. I noticed my name on the top file. I quickly open the manila file with my name and saw it had a copy of an oath of office (City Judge) dated 1977 and a copy of a W-2 form.

Dean began talking and his story was, he saw some fireman burning files in a 55-gallon drum near the Fire Department. He said one of them said they were being thrown away.

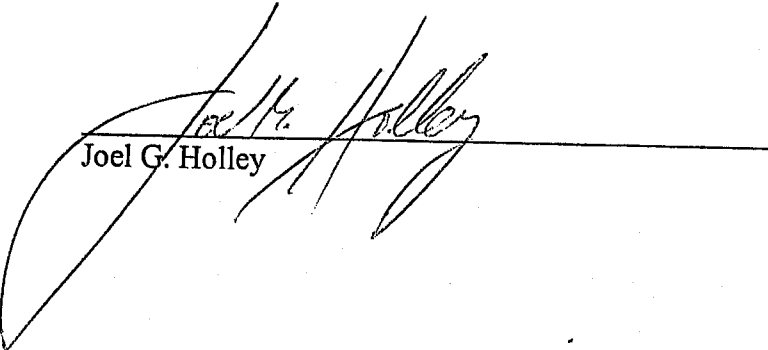
City of Lanett

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He got some of them. I asked him why? He said he figured his friends would want them. At some point, I told him I had retrieved a file with the name Bryan Poe from Attorney Don Phillips office. That the files are City property, that they were not being discarded but destroyed by burning. I asked him at some point which fireman or who said they were being thrown away. He said he didn't remember who was standing out there.

I asked him that if he was giving them to his friends, and that if the "boxes" of files were transported to the old house to be burned along with the old house by the fire department. (Sept. 2005, after Council meeting) Why hadn't he brought me my file in the 2 months since September 30th? He looked surprised and said that I had been busy with budget hearings. (I met one time with the Finance Committee after 5 pm EST.) My impression was that Dean was trying his best to cover his actions. The story he gave to me was not plausible. I turned the files ^{over to him} that morning to Chief Docimo. There were several files. I remember of course that one file had my name, and one had the name of Peggy Hester, a female Police Officer who worked at the City years ago. I do not recall the other names on files, but would recognize them if my memory was refreshed.

At Lanett City Hall this 17th day of November 2005 @ 3:43 p.m.


Joel G. Holley